

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-10106JLT

ZHANNA CHIZHIK,)
Administratrix of the Estate)
of Grigory Chizhik,)
Plaintiff)
v.)
SEA HUNT BOATS, INC.,)
TROPICLAND MARINE)
AND TACKLE, INC., and)
GREGORY ZILBERMAN,)
Defendants.)
)

**DEFENDANT SEA HUNT BOATS, INC.'S ASSENTED TO MOTION
TO EXTEND DEADLINE FOR DISCOVERY AND FILING MOTIONS**

Defendant Sea Hunt Boats, Inc. hereby respectfully moves the Court to extend the deadlines for discovery and filing motions sixty (60) days. As grounds for this motion, the Defendant states that the parties require additional time to conduct depositions and to file the necessary motions. The newly proposed deadlines would be as follows:

1. All factual depositions (non-expert witnesses) shall be concluded by April 19, 2005.
2. Plaintiff shall identify her experts pursuant to Fed. R. Civ. P. 26(a)(2) on or before May 6, 2005.
3. Defendants shall identify their experts pursuant to Fed. R. Civ. P. 26(a)(2) on or before June 17, 2005.
4. Plaintiff's experts shall be deposed by June 14, 2005.
5. Defendant's experts shall be deposed by July 29, 2005.

6. All discovery motions under Fed. R. Civ. P. 37 shall be filed on or before August 19, 2005.
7. All dispositive motions, including motions for summary judgment pursuant to Fed. R. Civ. P. 56 shall be filed on or before September 18, 2005.
8. The final pretrial conference shall be scheduled by the Court on or some time following October 31, 2005.
9. The parties expect to be ready for trial by December 9, 2005.

In further support of this motion, the undersigned attorney states that he has discussed this motion with counsel for the Plaintiff and Co-Defendants and has determined that they assent to this motion. This is the parties first request for an extension of the above deadlines.

WHEREFORE, the Defendant moves the Court to extend the deadlines in this matter as stated above.

The Plaintiff,
ZHANNA CHIZHIK
Administratrix of the Estate
Grigory Chizhik,
By her attorney,

/s/ Jay O'Brien
David B. Kaplan, Esq., BBO #258540
Jay O'Brien, Esq., BBO #642977
The Kaplan/Bond Group
Boston Fish Pier
West Building, Suite 304
Boston, MA 02210
(617) 261-0080

The Defendant,
SEA HUNT BOATS, INC.
By their attorneys,

/s/ William P. Breen, Jr.
William P. Breen, Jr., Esq. BBO #558768
Rebecca L. Andrews, Esq., BBO #644846
Murphy, Hesse, Toomey & Lehane, LLP
300 Crown Colony Drive, Suite 410
P.O. Box 9126
Quincy, MA 02269-9126
(617) 479-5000

The Defendant
Gregory Silberman,
By his attorneys,

/s/ David C. Stadolnik
David C. Stadolnik, Esq., BBO #551052
Smith & Brink, P.C.
122 Quincy Shore Drive
Second Floor
Quincy, MA 02171
(617) 770-2214

Tropicland Marine and Tackle, Inc.
By its attorney,

/s/ James T. Scamby
James T. Scamby, Esq., BBO # 629144
Tucker, Heifitz & Saltzman
Three School Street
Boston, MA, 02108
(617) 557-9696

/s/ Philip M. Hirshberg
Philip M. Hirshberg, Esq., BBO #567234
Morrison, Mahoney & Miller, LLP
250 Summer Street
Boston, MA 02210
(617) 737-8860

CERTIFICATION PURSUANT TO LOCAL RULE 7.1

The undersigned attorney certifies that prior to filing the above motion, he conferred in good faith with all counsel to narrow the issues raised by this motion. The undersigned attorney has determined that all counsel assents to the present motion.

/s/ William P. Breen, Jr.
William P. Breen, Jr.